

DOLORES Y. LEAL (134176)
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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
) **TABLES 1 AND 2 – ATTORNEY HOUR**
) **SUMMARIES PURSUANT TO THE**
) **COURT’S CIVIL STANDING ORDER**
) **SECTION F**
)
) *[Filed concurrently herewith Plaintiff Mark*
) *Snookal’s Notice of Motion and Motion for*
) *Attorneys’ Fees and Costs; Tables 1 and 2 to*
) *Plaintiff’s Motion for Attorneys’ Fees and*
) *Costs; Declarations of Dolores Y. Leal, Olivia*
) *Flechtsig, Renee Mochkatel, Karis Stephen,*
) *Sabria Medler, J. Bernard Alexander, III,*
) *Lisa Bloom, Tamara Freeze, and Mark*
) *Snookal; and [Proposed] Order Granting*
) *Plaintiff’s Motion for Attorneys’ Fees and*
) *Costs]*
)
) Action Filed: August 3, 2023
) Trial Dates: August 19-25, 2025
) Judgment Entered: September 3, 2025
)
) Date: November 13, 2025
) Time: 10:00 a.m.
) Crtrm: 5B
)

SUMMARY OF HOURS WORKED BY EACH ATTORNEY: ORGANIZED BY ATTORNEY

ATTORNEY	TASK	HOURS	HOURLY RATE	FEES
Dolores Leal	Client Consultation	4.0	\$1,200	\$4,800
Dolores Leal	Client Correspondence	4.7	\$1,200	\$5,640
Dolores Leal	Client Meetings	1.95	\$1,200	\$2,340
Dolores Leal	Review file	15.1	\$1,200	\$18,120
Dolores Leal	Legal Research	10.2	\$1,200	\$12,240
Dolores Leal	Draft Letter	7.3	\$1,200	\$8,760
Dolores Leal	Complaint	2.0	\$1,200	\$2,400
Dolores Leal	Opposing Counsel Correspondence	7.4	\$1,200	\$8,880
Dolores Leal	Review Defendant's Pleadings	5.9	\$1,200	\$7,080
Dolores Leal	Internal Meetings	22.05	\$1,200	\$26,460
Dolores Leal	Internal Correspondence	2.0	\$1,200	\$2,400
Dolores Leal	Opposing Counsel Meetings	2.9	\$1,200	\$3,480
Dolores Leal	Court Appearance	13.9	\$1,200	\$16,680
Dolores Leal	Review Court Communications / Rules	1.4	\$1,200	\$1,680
Dolores Leal	Written Discovery	16.0	\$1,200	\$19,200
Dolores Leal	Depositions	71.8	\$1,200	\$86,160
Dolores Leal	Subpoenas	1.5	\$1,200	\$1,800
Dolores Leal	Expert Correspondence	2.7	\$1,200	\$3,240
Dolores Leal	Mediation	20.6	\$1,200	\$24,720

Dolores Leal	Motion for Summary Judgment	10.0	\$1,200	\$12,000
Dolores Leal	Pretrial Filings	36.2	\$1,200	\$43,440
Dolores Leal	Ex Parte	2.6	\$1,200	\$3,120
Dolores Leal	Witness List	4.2	\$1,200	\$5,040
Dolores Leal	Special Verdict Form	0.4	\$1,200	\$480
Dolores Leal	Exhibit List	27.1	\$1,200	\$32,520
Dolores Leal	Jury Instructions	7.5	\$1,200	\$9,000
Dolores Leal	Jury Verdict Form	0.3	\$1,200	\$360
Dolores Leal	Voir Dire Preparation	5.1	\$1,200	\$6,120
Dolores Leal	Deposition Review for Trial Preparation	19.4	\$1,200	\$23,280
Dolores Leal	Witness Preparation	4.3	\$1,200	\$5,160
Dolores Leal	Trial Preparation	127.3	\$1,200	\$152,760
Dolores Leal	Trial	57.1	\$1,200	\$68,520
Dolores Leal	Draft Proposed Judgment	0.4	\$1,200	\$480
Dolores Leal	Attorney Fee Declarations & Motion	4.6	\$1,200	\$5,520
Renee Mochkatel	Review file	0.6	\$1,200	\$720
Renee Mochkatel	Motion for Summary Judgement (Prepare Separate Statement and Memo)	21.3	\$1,200	\$25,560
Renee Mochkatel	Trial Preparation Meetings	2.7	\$1,200	\$3,240
Renee Mochkatel	Witness Preparation	9	\$1,200	\$10,800
Karis Stephen	Review file	3.0	\$450	\$1,350
Karis Stephen	Legal Research	8.4	\$450	\$3,780
Karis Stephen	Deposition	2.5	\$450	\$1,125
Karis Stephen	Pretrial Filings	21	\$450	\$9,450
Karis Stephen	Internal Meetings	5.5	\$450	\$2,475
Karis Stephen	Trial Preparation	1.5	\$450	\$675

Karis Stephen	Trial Technology & Set Up	1.7	\$450	\$765
Karis Stephen	Opening Statement	1.6	\$450	\$720
Karis Stephen	Exhibits / Exhibit List	11.9	\$450	\$5,355
Karis Stephen	Trial – attend, prepare and present exhibits, daily trial strategy meetings, daily trial preparation, prepare closing argument and presentation	54.0	\$450	\$24,300
Karis Stephen	Declaration for Fee Motion	0.7	\$450	\$315
Sabrina Medler	Pretrial Filings	2.5	\$450	\$1,125
Sabrina Medler	Legal Research	9.45	\$450	\$1,800
Sabrina Medler	Trial	12.95	\$450	\$5,827.5
Sabrina Medler	Jury Instruction	6.75	\$450	\$3,037.5
Sabrina Medler	Trial Preparation	5.25	\$450	\$2,362.5
Sabrina Medler				
Sabrina Medler	Attorney Fee Declarations & Motion	0.5	\$450	\$225
Olivia Flechsig	Client Correspondence	6.38	\$650	\$4,147
Olivia Flechsig	Client Meetings	4.03	\$650	\$2,620
Olivia Flechsig	Review file	27.86	\$650	\$18,109
Olivia Flechsig	Legal Research	20.14	\$650	\$13,091
Olivia Flechsig	Draft Letter	2.33	\$650	\$1,515
Olivia Flechsig	Complaint	7.53	\$650	\$4,895
Olivia Flechsig	Opposing Counsel Correspondence	24.39	\$650	\$15,854
Olivia Flechsig	Review Defendant's Pleadings	2.58	\$650	\$1,677
Olivia Flechsig	Internal Meetings	18.81	\$650	\$12,227
Olivia Flechsig	Internal Correspondence	1.25	\$650	\$813

Olivia Flechsig	Opposing Counsel Meetings	9.46	\$650	\$6,149
Olivia Flechsig	Court Appearance	10.56	\$650	\$6,864
Olivia Flechsig	Review Court Communications / Rules	2.2	\$650	\$1,430
Olivia Flechsig	Joint FRCP26 Report	5.43	\$650	\$3,530
Olivia Flechsig	Joint Stipulations	5.25	\$650	\$3,413
Olivia Flechsig	Protective Order	1.9	\$650	\$1,235
Olivia Flechsig	Written Discovery	32.01	\$650	\$20,807
Olivia Flechsig	Depositions	39.01	\$650	\$25,357
Olivia Flechsig	Subpoenas	0.33	\$650	\$215
Olivia Flechsig	Expert Correspondence, Disclosures, Reports	25.95	\$650	\$16,868
Olivia Flechsig	Mediation	20.93	\$650	\$13,605
Olivia Flechsig	Motion for Summary Judgment	97.68	\$650	\$63,492
Olivia Flechsig	Pretrial Filings	38.16	\$650	\$24,804
Olivia Flechsig	Ex Parte	40.13	\$650	\$26,085
Olivia Flechsig	Witness List	1.65	\$650	\$1,073
Olivia Flechsig	Exhibit List	2.7	\$650	\$1,755
Olivia Flechsig	Jury Instructions	2.88	\$650	\$1,872
Olivia Flechsig	Jury Verdict Form	0.2	\$650	\$130
Olivia Flechsig	Deposition Review for Trial Preparation	8	\$650	\$5,200
Olivia Flechsig	Witness Preparation	8.73	\$650	\$5,675
Olivia Flechsig	Trial Preparation	76.31	\$650	\$49,602
Olivia Flechsig	Trial	45.45	\$650	\$29,543
Olivia Flechsig	Attorney Fee Declarations & Motion	13.95	\$650	\$9,068
ALL ATTORNEYS	TOTALS	1,306.87 HOURS		\$1,124,050.50

SUMMARY OF HOURS WORKED BY EACH ATTORNEY: ORGANIZED BY TASK

TASK	ATTORNEY	HOURS	HOURLY RATE	FEES
Client Consultation	Dolores Leal	4.0	\$1,200	\$4,800
Client Correspondence	Dolores Leal	4.7	\$1,200	\$5,640
Client Correspondence	Olivia Flechsig	6.38	\$650	\$4,147
Client Meetings	Dolores Leal	1.95	\$1,200	\$2,340
Client Meetings	Olivia Flechsig	4.03	\$650	\$2,620
Review File	Dolores Leal	15.1	\$1,200	\$18,120
Review File	Karis Stephen	3.0	\$450	\$1,350
Review File	Renee Mochkatel	0.6	\$1,200	\$720
Review File	Olivia Flechsig	27.86	\$650	\$18,109
Legal Research	Dolores Leal	10.2	\$1,200	\$12,240
Legal Research	Karis Stephen	8.4	\$450	\$3,780
Legal Research	Sabrina Medler	9.45	\$450	\$4,252.5
Legal Research	Olivia Flechsig	20.14	\$650	\$13,091
Draft Letter	Dolores Leal	7.3	\$1,200	\$8,760
Draft Letter	Olivia Flechsig	2.33	\$650	\$1,515
Complaint	Dolores Leal	2.0	\$1,200	\$2,400
Complaint	Olivia Flechsig	7.53	\$650	\$4,895
Opposing Counsel Correspondence	Dolores Leal	7.4	\$1,200	\$8,880
Opposing Counsel Correspondence	Olivia Flechsig	24.39	\$650	\$15,854
Review Defendant's Pleadings	Dolores Leal	5.9	\$1,200	\$7,080
Review Defendant's Pleadings	Olivia Flechsig	2.58	\$650	\$1,677
Internal Meetings	Dolores Leal	22.05	\$1,200	\$26,460
Internal Meetings	Olivia Flechsig	18.81	\$650	\$12,227
Internal Meetings	Karis Stephen	5.5	\$450	\$2,475
Internal Correspondence	Dolores Leal	2.0	\$1,200	\$2,400
Internal Correspondence	Olivia Flechsig	1.25	\$650	\$813

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Opposing Counsel Meetings	Dolores Leal	2.9	\$1,200	\$3,480
Opposing Counsel Meetings	Olivia Flechsig	9.46	\$650	\$6,149
Court Appearance	Dolores Leal	13.9	\$1,200	\$16,680
Court Appearance	Olivia Flechsig	10.56	\$650	\$6,864
Review Court Communications / Rules	Dolores Leal	1.4	\$1,200	\$1,680
Review Court Communications / Rules	Olivia Flechsig	2.2	\$650	\$1,430
Joint FRCP26 Report	Olivia Flechsig	5.43	\$650	\$3,530
Joint Stipulations	Olivia Flechsig	5.25	\$650	\$3,413
Protective Order	Olivia Flechsig	1.9	\$650	\$1,235
Written Discovery	Dolores Leal	16.0	\$1,200	\$19,200
Written Discovery	Olivia Flechsig	32.01	\$650	\$20,807
Depositions	Dolores Leal	71.8	\$1,200	\$86,160
Depositions	Olivia Flechsig	39.01	\$650	\$25,357
Depositions	Karis Stephen	2.5	\$450	\$1,125
Subpoenas	Dolores Leal	1.5	\$1,200	\$1,800
Subpoenas	Olivia Flechsig	0.33	\$650	\$215
Expert Correspondence, Disclosures, Reports	Dolores Leal	2.7	\$1,200	\$3,240
Expert Correspondence, Disclosures, Reports	Olivia Flechsig	25.95	\$650	\$16,868
Mediation	Dolores Leal	20.6	\$1,200	\$24,720
Mediation	Olivia Flechsig	20.93	\$650	\$13,605
Motion for Summary Judgment	Dolores Leal	10.0	\$1,200	\$12,000

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Motion for Summary Judgment	Olivia Flechsig	97.68	\$650	\$63,492
Motion for Summary Judgment	Renee Mochkatel	21.3	\$1,200	\$25,560
Pretrial Filings	Dolores Leal	36.2	\$1,200	\$43,440
Pretrial Filings	Olivia Flechsig	38.16	\$650	\$24,804
Pretrial Filings	Karis Stephen	21	\$450	\$9,450
Pretrial Filings	Sabrina Medler	2.5	\$450	\$1,125
Ex Parte	Dolores Leal	2.6	\$1,200	\$3,120
Ex Parte	Olivia Flechsig	40.13	\$650	\$26,085
Witness List	Dolores Leal	4.2	\$1,200	\$5,040
Witness List	Olivia Flechsig	1.65	\$650	\$1,073
Special Verdict Form	Dolores Leal	0.4	\$1,200	\$480
Exhibits / Exhibit List	Dolores Leal	27.1	\$1,200	\$32,520
Exhibits / Exhibit List	Olivia Flechsig	2.7	\$650	\$1,755
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Jury Verdict Form	Dolores Leal	0.3	\$1,200	\$360
Jury Verdict Form	Olivia Flechsig	0.2	\$650	\$130
Voir Dire Preparation	Dolores Leal	5.1	\$1,200	\$6,120
Deposition Review for Trial Preparation	Dolores Leal	19.4	\$1,200	\$23,280
Deposition Review for Trial Preparation	Olivia Flechsig	8	\$650	\$5,200
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Witness Preparation	Olivia Flechsig	8.73	\$650	\$5,675
Witness Preparation	Renee Mochkatel	9	\$1,200	\$10,800
Trial Preparation	Dolores Leal	127.3	\$1,200	\$152,760
Trial Preparation	Olivia Flechsig	76.31	\$650	\$49,602

SUMMARY OF HOURS WORKED BY EACH ATTORNEY: ORGANIZED BY TASK

Trial Preparation	Karis Stephen	1.5	\$450	\$675
Trial Preparation	Renee Mochkatel	2.7	\$1,200	\$3,240
Opening Statement	Karis Stephen	1.6	\$450	\$720
Trial Technology & Set Up	Karis Stephen	1.7	\$450	\$765
Trial	Dolores Leal	57.1	\$1,200	\$68,520
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Draft Proposed Judgment	Dolores Leal	0.4	\$1,200	\$480
Attorney Fee Declarations & Motion	Dolores Leal	4.6	\$1,200	\$5,520
Attorney Fee Declarations & Motion	Olivia Flechsig	13.95	\$650	\$9,068
Attorney Fee Declarations & Motion	Karis Stephen	0.7	\$450	\$315
Attorney Fee Declarations & Motion	Sabrina Medler	.5	\$450	\$225
TOTALS	ALL ATTORNEYS	1306.87		\$1,124,050.50